

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHAW FAMILY ARCHIVES, LTD., BRADFORD  
LICENSING, INC., JAMES E. DOUGHERTY,  
VALHALLA PRODUCTIONS, LLC., EDITH  
MARCUS, and META STEVENS,

Plaintiffs/Consolidated Defendants,

-against-

CMG WORLDWIDE, INC., an Indiana Corporation  
and MARILYN MONROE, LLC, a Delaware  
Limited Liability Company,

Defendants/Consolidated Plaintiffs.  
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: Index No. 05 CV 3939 (CM)  
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: Honorable Colleen McMahon  
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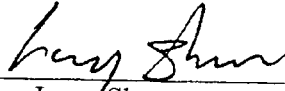
DECLARATION OF LARRY SHAW

1. I, LARRY SHAW, declare the following facts under penalty of perjury.
2. I am one of three shareholders and owners of the Shaw Family Archives, Ltd. ("SFA"). The remaining shareholders/owners of SFA are my sisters, Plaintiffs Edith Marcus and Meta Stevens. Edith Marcus, Meta Stevens, and I are the children of the late Sam Shaw. SFA has the right to market, license and offer for commercial exploitation, the Shaw Collection, including all photographs of Marilyn Monroe taken by Sam Shaw, pursuant to a June 5, 2002 agreement between myself and my sisters.
3. I submit this affidavit in support of Plaintiffs' motion, pursuant to the Indiana Right to Publicity Statute, 32-36-1-12 (the "Indiana Statute"), for attorneys' fees, costs and expenses in this action, from April 4, 2005 to May 2, 2007, and for such other relief as the Court may deem just and proper.

4. Attached as Exhibit A is a true and correct copy of an electronic communication I received at the Internet address larry@spc-promotions.com from Mark Roesler, from the Internet address mark@cmgworldwide.com.

5. On a number of occasions, Mr. Roesler told me on the telephone and in person that should the Defendants prevail in this action, they would be entitled to their attorney's fees as a prevailing party under the Indiana Statute.

Dated: New York, New York  
May 22, 2007

  
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Larry Shaw